

**EXHIBIT A**

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR KING COUNTY

ELIZABETH SOLIS AND VICTOR  
SOLIS, a marital community,

Plaintiffs,

v.

ESSEX PROPERTY TRUST, INC.,  
d/b/a ESSEX PROPERTY, INC., a  
foreign corporation, ESSEX  
MANAGEMENT CORPORATION,  
INC., a foreign corporation, XYZ CO., a  
foreign corporation, limited liability  
company, limited liability partnership,  
partnership or sole proprietorship,

Defendants.

NO. 21-2-03556-2

COMPLAINT FOR DAMAGES

COME NOW Plaintiffs Elizabeth Solis and Victor Solis and for complaint allege:

**I. PARTIES**

1.1 At all relevant times hereto, plaintiffs Elizabeth and Victor Solis were residents of King County, Washington and tenants at Evergreen Heights Apartments in Kirkland, WA.

1.2 At all relevant times hereto, defendant Essex Property Trust, Inc., d/b/a Essex Property, Inc. was a foreign corporation doing business in King County, Washington and

COMPLAINT FOR DAMAGES - 1

West Law Firm, P.S.  
524 Tacoma Avenue South  
Tacoma, Washington 98402  
(253) 383-4704

1 the lawful owner and/or operator of Evergreen Heights Apartments located at 12216-  
2 12233 NE 131<sup>st</sup> Way, Kirkland, WA 98034, and responsible for the safe maintenance and  
3 repair of said property on behalf of the tenants.

4 1.3 At all relevant times hereto, defendant Essex Management Corporation, Inc.  
5 was a foreign corporation doing business in King County, Washington and the lawful  
6 owner and/or operator of Evergreen Heights Apartments located at 122216-12233 NE  
7 131st Way, Kirkland, WA 98034, and responsible for the safe maintenance and repair of  
8 said property on behalf of the tenants.  
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10 1.4 At all relevant times hereto, defendant XYZ CO. was a foreign corporation  
11 doing business in King County, Washington and the lawful owner and/or operator of  
12 Evergreen Heights Apartments located at 122216-12233 NE 131st Way, Kirkland, WA  
13 98034, and responsible for the safe maintenance and repair of said property on behalf of  
14 the tenants.

## 15 II. JURISDICTION AND VENUE

16 2.1 Jurisdiction is proper in the State of Washington because all parties reside in,  
17 or do business in, Washington. The Superior Court of King County, State of  
18 Washington, has subject matter jurisdiction over this action pursuant to RCW 2.08.010.

19 2.2 Venue is proper in and for King County because the defendants either own  
20 property and do business in, or reside in, King County and because the acts and  
21 omissions alleged herein resulted in personal injury in Kirkland, King County,  
22 Washington.  
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**III. FACTS**

3.1 On or about March 23, 2018, plaintiff Elizabeth Solis parked her car in her designated parking stall at the Evergreen Heights Apartments owned and/or controlled by the defendants. The defendants' negligence, including but not limited to their failure to provide and maintain safe walkways for tenants, failure to remove unsafe and hazardous conditions from the area, and failure to properly design and comply with local and national safety standards for the subject parking lot, proximately and directly caused the plaintiff to fall and sustain serious and permanent injuries.

**IV. DAMAGES**


4.1 This incident caused the plaintiff Elizabeth Solis to incur past and future medical expenses, past and future income loss, general damages for pain and suffering, permanent disability, emotional distress, loss of enjoyment of life, and other damages, all in amounts to be proven at the time of trial.

4.2 As a direct and proximate result of defendants' acts and omissions set forth above, plaintiff Victor Solis lost the consortium of his spouse to his damage in an amount to be proven at the time of trial.

WHEREFORE, plaintiffs pray for judgment against the defendants for damages as alleged, plus costs.

DATED this 17<sup>th</sup> day of March, 2021.

WEST LAW FIRM, P.S.

By:   
Patrick R. West, WSBA #41949  
Attorneys for Plaintiffs